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Attorneys for Shelley D. Krohn, Trustee

**UNITED STATES BANKRUPTCY COURT
 DISTRICT OF NEVADA**

In re:	Case No. BK-S-16-15388-MKN
SUPERIOR LINEN, LLC,	Chapter 7
Debtor	Adversary No. 18-01096-MKN

SHELLEY D. KROHN, CHAPTER 7
 TRUSTEE,

Plaintiff,

v.

ECOLAB INC., aka ECOLAB TEXTILE
 CARE,

Defendant.

**AMENDED COMPLAINT FOR AVOIDANCE
 OF PREFERENCE PAYMENTS**

Shelley D. Krohn, Trustee (the "Trustee"), the Chapter 7 trustee in the above-captioned case, by and through her counsel, Schwartz & McPherson Law Firm, hereby files this Amended Complaint For Avoidance Of Preference Payments and alleges and avers as follows:

PARTIES

1. Plaintiff Shelley D. Krohn ("Plaintiff") is the Chapter 7 Trustee of the bankruptcy estate of Superior Linen, LLC (the "Debtor").

2. Upon information and belief, Defendant Ecolab Inc., aka Ecolab Textile Care ("Defendant") is and was at all times relevant herein, a corporation incorporated in the State of Delaware.

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JURISDICTION AND VENUE

3. The Court has jurisdiction over this complaint pursuant to 28 U.S.C. § 1334 and 157 and 11 U.S.C. §§ 547 and 550.

4. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(F).

5. Venue is proper pursuant to 28 U.S.C. § 1409.

GENERAL ALLEGATIONS

6. Superior Linen, LLC made the following transfers to Defendant:

Check Amount	Check No.	Date Issued	Date Honored
\$30,897.43	34655	June 7, 2016	July 18, 2016
\$5,097.41	34778	July 14, 2016	July 26, 2016
\$32,343.88	34848	August 8, 2016	August 22, 2016
\$33,610.22	35112	September 26, 2016	September 30, 2016

(collectively, the "Transfers"). True and correct copies of the Transfers are attached hereto as Exhibit 1.

7. On September 30, 2018, the Debtor filed for relief under Chapter 7 of the Bankruptcy Code.

FIRST CLAIM FOR RELIEF
(11 U.S.C. § 547)

8. The Plaintiff repeats and realleges each and every allegation contained in the preceding paragraphs and incorporates the same as if fully set forth herein.

9. The Transfers were an interest of the Debtor in property.

10. The Transfers were made to or for the benefit of a creditor, the Defendant.

11. The Transfers were made for or on account of an antecedent debt owed by the Debtor before the Transfers were made.

12. The Transfers were made while the Debtor was insolvent.

13. The Transfers were made within ninety days of the Petition Date.

14. The Transfers enabled the Defendant to receive more than it would have received if

1 the Transfers had not been made and the Defendant had received payment of such debt to the
2 extent provided by the provisions of this title.

3 15. The Plaintiff is entitled to a money judgment against the Defendant in the amount
4 of the Transfers, or avoidance of the Transfers, in accordance with 11 U.S.C. §§ 547 and 550.

5 **SECOND CLAIM FOR RELIEF**
6 **(11 U.S.C. § 550)**

7 16. The Plaintiff repeats and realleges each and every allegation contained in the
8 preceding paragraphs and incorporates the same as if fully set forth herein.

9 17. Plaintiff is entitled to a judgment and order requiring and compelling Defendant to
10 return to the Plaintiff the Transfers.

11 WHEREFORE, the Plaintiff prays for judgment against the Defendant as follows:

- 12 1. For an order avoiding the Transfers;
13 2. For an award of damages in the monetary sum of the Transfers;
14 3. For attorney's fees and costs of suit where appropriate;
15 4. For interest under 28 U.S.C. § 1961(a) from the initial date of demand; and
16 5. For all other relief the Court deems just and proper.

17 DATED: September 28, 2018.

18 /s/ Jeanette E. McPherson

19 Jeanette E. McPherson, Esq.


20 Schwartz & McPherson Law Firm

21 2850 South Jones Blvd., Suite 1

22 Las Vegas, NV 89146

23 *Attorneys for Shelley D. Krohn, Chapter 7 Trustee*

EXHIBIT 1


<p>SUPERIOR LINEN, LLC OPERATING ACCOUNT 4501 MITCHELL ST NORTH LAS VEGAS, NV 89081 Not valid after 90 days</p>	<p>NEVADA STATE BANK THE GOOD TO YOUR FUTURE 100 S. Las Vegas, NV 89101 94-77/1224</p>	<p>34655</p> <p>6/7/2016</p> <p>\$ **30,897.43</p>
<p>PAY TO THE ORDER OF Ecolab</p>		
<p>Thirty Thousand Eight Hundred Ninety-Seven and 43/100 *****</p>		
<p>Ecolab PO Box 100512 Pasadena, CA 91189-0512</p>		<p>DOLLARS</p>
<p>MEMO 40000478</p>		<p>Two signatures required if over \$10,000</p> <p><i>[Signature]</i> AUTHORIZED SIGNATURE</p>
<p>⑈00034655⑈ ⑆122400779⑆ 612087106⑈ ⑆0003089743⑆</p>		

<p>JPMORGANCHASE BK</p> <p>071816 >07490996</p> <p>01208611 010051</p> <p>00007105 021</p>	<p>CR TO NMD</p> <p>PAYEE ALL</p> <p>RTS RSVD</p> <p>0000000005101921</p>
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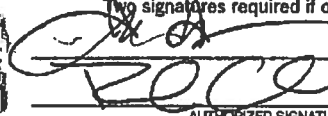
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Date:07/18/16 Seq #:73010081 Account:612087106 Serial #:34655 Amount:\$30,897.43 Dep Seq #:-

SUPERIOR LINEN, LLC OPERATING ACCOUNT 4501 MITCHELL ST NORTH LAS VEGAS, NV 89081 Not valid after 90 days		NEVADA STATE BANK THE GOOD TO YOUR FUTURE P.O. Box 990, Las Vegas, NV 89128 www.nsbml.com 94-77/1224	34778 7/14/2016
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Five Thousand Ninety-Seven and 41/100*****			
Ecolab PO Box 100512 Pasadena, CA 91189-0512		Two signatures required if over \$10,000  AUTHORIZED SIGNATURE	
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Date: 07/26/16 Seq #: 73005478 Account: 612087106 Serial #: 34778 Amount: \$5,097.41 Dep Seq #:-

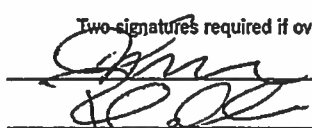
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PAY TO THE ORDER OF Ecolab		\$ **32,343.88	
Thirty-Two Thousand Three Hundred Forty-Three and 88/100*****		DOLLARS	
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		9/26/2016
PAY TO THE ORDER OF	Ecolab	\$ **33,610.22
Thirty-Three Thousand Six Hundred Ten and 22/100*****		DOLLARS
Ecolab PO Box 100512 Pasadena, CA 91189-0512		Two signatures required if over \$10,000  AUTHORIZED SIGNATURE
MEMO 40000478		
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Date:09/30/16 Seq #:73035475 Account:612087106 Serial #:35112 Amount:\$33,610.22 Dep Seq #:-